

September 29, 2011

***Ex Parte* Notice**

Filed Via ECFS

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Ex Parte* Notice – Granite Telecommunications, LLC
WC Docket Nos. 10-90, 07-135, and 05-337, GN Docket No. 09-51,
and CC Docket No. 01-92

Dear Secretary Dortch:

On Thursday, September 29, 2011, Sam Kline and Geoff Cookman of Granite Telecommunications, LLC, and the undersigned counsel to Granite from Sullivan & Worcester, LLP, held a conference call with Zachary Katz, Chief Counsel and Senior Legal Advisor to the Chairman, to discuss the Commission's pending intercarrier compensation rulemaking in the above-referenced dockets.

The discussion followed the attached presentation, which was distributed to all attendees. The discussion also was consistent with points expressed in Granite's Reply Comments and Supplemental Comments filed in the above-referenced proceedings on May 23, 2011, and August 24, 2011, respectively.

As set forth in the presentation, Granite provides over a million analog POTS lines and broadband services, obtained pursuant to long-term wholesale commercial contracts with underlying carriers such as Verizon and AT&T, to some 14,000 business customers with approximately 240,000 locations nationwide, including 68 of the nation's 100 largest companies. Granite explained that, while it must compete on price, it also differentiates itself from the incumbents by providing exceptional, customer-centric service, and is adding approximately 1,000 new analog POTS lines every business day.

Granite explained that its business depends on long-term commercial agreements with its underlying carriers, which lock-in the compensation that Granite must pay. Accordingly, Granite explained that if the intercarrier compensation it can collect is reduced without an appropriate transition period that allows for expiration, and then renegotiation, of the underlying

long-term agreements, it will jeopardize Granite's business and foreclose competitive options for some of the largest companies in the nation.

Granite also discussed the need for an end-point intercarrier compensation rate that has a justifiable cost basis, since its underlying wholesale agreements will never reflect a zero (bill-and-keep) or likely even a \$.0007 rate, neither of which reflect actual costs.

Granite also explained that, because a majority of its lines serve retail locations and restaurants that have far more incoming than outgoing calls, its traffic is naturally asymmetric, and should not be confused with access stimulation.

Pursuant to section 1.1206(b) of the Commission's rules, a copy of this letter is being filed via the Commission's ECFS for inclusion in the public record of the above-referenced proceedings.

Respectfully submitted,



L. Elise Dieterich
Kathy L. Cooper

cc: Chairman Genachowski
Zachary Katz
Sam Kline
Geoff Cookman

Attachment



*Granite Telecommunications
Presentation to :*

*The Federal Communications
Commission*

Presented by: Sam Kline



Meeting Agenda

- Who is Granite?
- Granite product overview
- Facts about Granite
- Some customers
- Key points
- Inter-Carrier Compensation
- Recommendations



Who is Granite?

- Professional Services company specializing in telecommunications management.
- Product suite centered around flexible, middleware solution.
- Headquarters in Quincy, MA, with offices in New York City, Atlanta, Providence and Miami.
- Customers include 68 of America's top 100 largest companies.
- 1,060,000 business lines under management.
- 14,000 clients with 240,000 locations nationwide.
- Wholesale contracts with all incumbent LEC's.
- Granite now has about 850 employees and has been recognized as one of the fastest growing companies adding new jobs in New England.



Product Overview

- **Local/Long Distance Telephone Service**
 - Contracted national distributor of local pots telephone line services.
 - No term plans, fees, volume commitments or start-up costs
 - Contracted national LD provider.
 - Consolidated inventory and invoicing.
- **Inside Wiring**
 - Provide inside wiring installation and maintenance nationwide.
 - Carefully installed, clearly labeled and well-tested wiring system.
- **Broadband**
 - Provision and management services of Broadband data lines.
 - DSL, Cable and Wireless.
- **Alarms**
 - Burglar and Fire alarm monitoring, installation and repair.



Facts About Granite

- We have long-term wholesale contracts with all major carriers.
- We serve no residential customers.
- No POTS customer contracts required.
- We differentiate ourselves based on Service, Billing, and Customer Support.
 - No IVR systems in our call center (a live person always answers the phone).
 - Customer wait time averages less than 8 seconds.
 - Custom bills - single customized file, compatible with Oracle, JP Edwards, SAP, and many others
 - Service – we address all customer service problems and regularly go above-and-beyond for our customers.

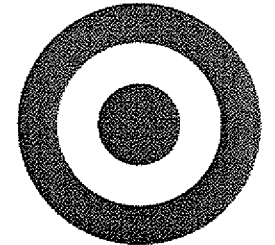


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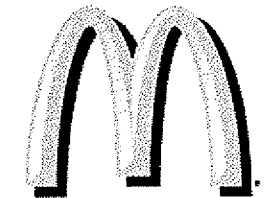
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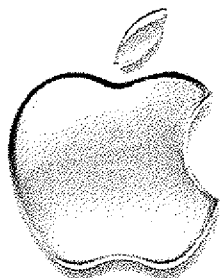


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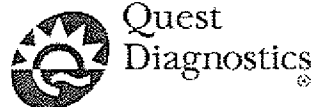
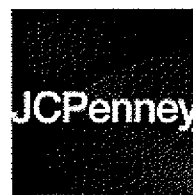
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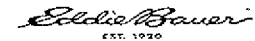


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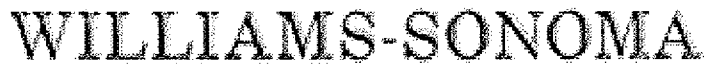


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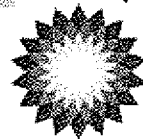


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Key Points

- **Analog POTS is not dead!** Granite adds about 1,000 new analog POTS lines every business day.
 - Business customers still depend on analog POTS for much of their voice service.
- National customer service, custom billing and support work as a business model – Granite has less than 1% non-structural churn on POTS lines.



Inter-Carrier Compensation

- Granite pays compensation based on contract terms in our long-term commercial contracts. (Typically 5-years or longer).
- Granite traffic is NOT symmetrical.
 - Customers like AutoZone or Pizza Hut have many more incoming calls than outgoing calls.



Inter-Carrier Compensation

- A model where Granite is committed to pay compensation (by contract) at rates lower than it can collect creates a situation where every call loses money.
- Any change to the existing model must be over a timeframe to allow us to work through existing contracts and adjust business models.
- Any change process must have an end-point rate that has a justifiable cost basis.



Recommendations

- Remember that business customers are still dependent on Analog POTS and are likely to remain dependant for the many years.
- Create a process that allows CLECs enough time to work-through existing contracts and adjust business models to the new process.
 - This will require a minimum of 6 years for existing contracts and 2-3 additional years to converge on a new process.
- Create a end-point rate that allows us recover costs.
 - \$.0007 assumes an ISP model .
 - TELRIC based transportation and termination costs are in the \$.002 -\$.004 range.